

CalFresh Mid Period Reporting

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Small County Training, July 2017

Agenda

- The Basics: California's Reporting System
- Mid Period Reporting
 - California's Option: Act Only on Certain Changes
 - Voluntary report = benefit increase
 - Voluntary request to close CalFresh case
 - Information that is considered Verified Upon Receipt (VUR)
 - Change in household's public assistance grant
 - Mandatory Reports
 - County Initiated Mid Period Actions
- Questions & Discussion

Background: Simplified Reporting

- California moved to Simplified Reporting in 2013
- California implemented a semi-annual reporting frequency with a periodic report due at six months and a recertification application due at one year.
- Federal regulations at 7 CFR 273.12(a)(5) provide two distinct policy options regarding how States may choose to respond to changes that occur during the certification period.
- California chose to **act only on certain changes** reported during the certification period.
- Resource: All County Letter (ACL) 12-25; ACL 12-25E

Action on Changes

Under this option, federal regulations at 7 CFR 273.12(a)(1)(vii) require State agencies to act on all changes reported by a household that would increase its benefits, and to act on changes that would decrease a household's benefits in only three circumstances: 3

- (1) If the household has voluntarily requested its case be closed;
- (2) If the State agency has information about the household's circumstances considered Verified Upon Receipt (VUR); and
- (3) if there has been a change in the household's Public Assistance (PA) grant.

Mandatory Mid-Period Reports

CalFresh recipients have two mandatory reports that must be made during the certification period and acted on by the CWD:

- (1) Income over the Income Reporting Threshold (IRT); and
 - (2) Drop in work hours below 20 hours per week, averaged monthly, for Able Bodied Adults Without Dependents (ABAWDs) subject to the time limit.
- Households must report either change within 10 days of the occurrence

County Initiated Mid-Period Action

Finally, the CWD must also act on certain changes in eligibility status. These changes are considered “county initiated mid period actions”.

These are mass changes and/or changes that the client does not need to report, such as a cost of living adjustment (COLA) or a change in eligibility criteria due to legislative or regulatory action.

Let's Review

The CWD will act mid-period when the following information is received:

1. Mandatory required report of income over the IRT and/or a drop in ABAWD work hours;
2. Voluntary report of change in circumstances resulting in an increase in benefits;
3. Voluntary request to close CalFresh case;
4. Information that is considered Verified Upon Receipt (VUR);
5. Change in a household's public assistance grant; and
6. County initiated mid-period actions.

1. Mandatory Report: IRT

- CalFresh recipients who are subject to the IRT requirements are required to report mid-period when their income exceeds the IRT for their household size.
- Household reports of income received over the IRT require no further verification.
- If a household reports receipt of income over the IRT, the CWD must determine if the household's new income will continue to be over the IRT for at least one month.

1. Mandatory Report: IRT

- If the household reports that the income over the IRT will continue at this level for more than one month, the CWD must determine if the new income is at a level that will render the household ineligible for CalFresh. If the household has been conferred Modified Categorical Eligibility (MCE) status, they may remain eligible if their gross income is below 200% and their net income is below 100% FPL.

Note: Income over the IRT does not require further verification, BUT determining continuing eligibility does.

1. Mandatory Report: ABAWD Hours

- ABAWDs who are subject to the time limit and are meeting the work requirement through employment will be required to report within 10 days when hours of work drop below 20 hours per week averaged monthly.
- This mandatory mid-period reporting requirement applies only to ABAWDs subject to the time limit in counties that do not have an ABAWD waiver.

2. Voluntary Report = Benefit Increase

- If a household makes a voluntary mid-period report, the CWD must first assess whether the information reported mid-period would result in an increase in benefits prior to taking steps to obtain verification. This is to reduce the likelihood of verifying information that is not required to be reported and that would result in a decrease benefits.
- Once voluntarily reported information has been verified, the CWD must act on the change mid-period.

3. Voluntary Report: Close Case

- Voluntary requests to close a CalFresh case made by the head of household or responsible adult household member are actionable mid-period and require no further verification.
- If the request is made verbally, the CWD shall discontinue the case at the end of the month in which timely and adequate notice can be provided.
- If the request is made in writing or in the presence of an eligibility worker, only adequate notice is required; a timely (10 day) notice is not required.

4. Verified Upon Receipt

- Information about a household's circumstances considered VUR are actionable mid-period and require no further verification.
- Information reported to the county that is considered VUR is:
 - (1) From the primary source;
 - (2) Complete;
 - (3) Not questionable; and
 - (4) Requires no further verification to act on the change.

4. Verified Upon Receipt

- A very limited number of mid-period reports are considered VUR:
 - Voluntary Report of Household Composition Change
 - Voluntary Report of Address Change
 - Payment Verification System (PVS) Reports
 - Intentional Program Violation (IPV) Reports

VUR is like a....



Let's take this analogy even further....

- A VUR-icorn is rare. Only a a very limited number of mid-period reports are VUR.
- A verified mid-period report is not a vur-icorn, it is simply a verified mid-period report.
- Information cannot become VUR. It is born VUR.



Verified Mid-Period Reports

- CWDs must always act on information that is verified regardless of whether the action results in an increase or decrease in benefits. If at any time a CWD receives secondary verification (i.e. supporting documentation) of a change in household circumstances, the CWD must act.

In other words:

Once verified, information received mid-period is actionable.

5. Change in PA Case

- If a PACF household makes a voluntary mid-period report and the PA program does not act, CalFresh need not act unless the reported information is considered VUR or will cause an increase in CalFresh benefits.
- If a PACF household makes a mid-period report and the PA program acts, CalFresh must act on the report mid-period. If a household makes a mid-period report and the PA program does not act, then CalFresh does not act.

In other words:

- If CalWORKs acts to change a client's PA case after a change is reported for that program, the CWD must act on the CalFresh case as well.
- If CalWORKs does not act to change a client's PA case after a change is reported for that program, the CWD does not act on the CalFresh case.

6. County Initiated Mid-Period Action

- In certain circumstances the CWD must act on changes in eligibility status at the end of the month in which timely and adequate notice can be provided even if it results in a decrease or termination of benefits.

Examples include:

- Annual Cost of Living Adjustment
- A member of the household receives SSI/SSP benefits



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